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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

IN RE:) Case No.: 19-26878-E-13C
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)) Chapter 13
))
)) Motion Control No. SDH-3
))
)) MOTION TO CONFIRM THIRD
)) AMENDED CHAPTER 13 PLAN
))
)) 11 USC SECTION 1323, 1325
))
)) Date: June 23, 2020
)) Time: 3:00 p. m.
)) Place: Courtroom 33, Dept. E
)) 501 I Street, 6th Floor
)) Sacramento, CA 95814
)) Judge: Sargis
))

The Debtor hereby requests that the Court confirm the Third Amended Chapter
13 Plan filed by the debtor on May 7, 2020.

1. The new plan should resolve the trustee's objection to the first plan which
failed the liquidation analysis. The new plan is based on the value of some
annuities and an old car that were not listed in the original schedules.

2. The debtor has amended schedules B and C to include the unlisted assets, correct the exemptions, and to show the non-exempt equity in the annuities.
3. The payments will be \$1,840.00 a month for month one and then increase to \$2,700.00 for month two and then increase to \$3,067.00 for months three through 60 or until the plan is paid off.
4. The debtor has amended Schedules I and J to show that he can afford the higher payments. See Declaration of Louis Javar filed with this motion.
5. Debtor has filed his 2017 tax return and provided a copy to the IRS.
6. The plan has been changed from an 84 percent plan to a 14 percent plan to provide for the filed tax claims and all of the unsecured claims.
7. The debtor also amended the plan to provide for the arrearages of both mortgages in Class 1 based on the amount of the claims filed.
8. The debtor believes that the Third Amended Chapter 13 Plan satisfies the requirements of 11 U.S.C. Sections 1322 and 1325; that it will be acceptable to the trustee; that it will not be objectionable to creditors or their interests, and that it furthers the goals of the bankruptcy statutes.

Wherefore, the debtor requests that the Court confirm the Third Amended

Chapter 13 Plan and permit the debtor to proceed under this plan.

Dated: 5/7, 2020

Respectfully Submitted,
/s/ SCOTT HUGHES
Scott Hughes
Attorney for Debtor, Louis Jayar